Balance of State Continuum of Care Program
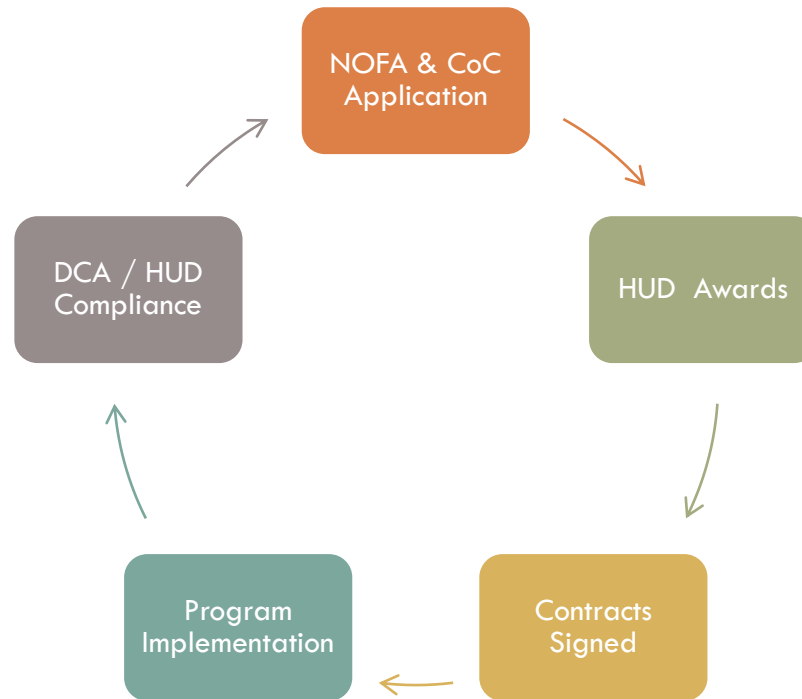
Georgia® Department of
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Presented by DCA as Collaborative Applicant

CoC Program Recipients

- CoC Program Recipients – formerly known as Supportive Housing Program (SHP)

- Direct grantee with HUD

- E-snaps
  - Keep updated
  - Application submission
  - Annual Performance Report (APR)

CoC Award and Implementation

Continuum of Care Program

KNOW the Regs!

https://www.hudexchange.info/coc/coc-program-law-regulations-and-notices/

https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/

https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
24 CFR Part 578   [Docket No. FR-5476-I-01]   RIN 2506-AC29
Homeless Emergency Assistance and Rapid Transition to Housing:
Continuum of Care Program

AGENCY: Office of the Assistant Secretary for Community Planning and Development.
ACTION: Interim rule.

PART 578 — CONTINUUM OF CARE PROGRAM

	Introductory Sections	Commenting Instructions	
		Executive Summary	
		Background / Summary	
Subpart A – General Provisions			*Regulation*
578.1	Purpose and scope.	*Preamble*	*Regulation*
578.3	Definitions.	*Preamble*	*Regulation*
Subpart B – Establishing and Operating a Continuum of Care		*Preamble*	*Regulation*

Balance of State CoC Monitoring

- Continuum of Care Monitoring
  - Monitoring visits
  - Homeless documentation (random files vs APR/competition data)
  - Chronic homelessness documentation
  - Other
  - Performance and Data Monitoring

Organization Review - Agency Capacity

- **Renewal** projects - Project Threshold Criteria

  - Agency demonstrates they have capacity to carry out and implement the project proposed. Eligible renewing projects are considered to have met threshold unless other information is available to the contrary.

- **New** projects

  - Agency demonstrates they have the capacity to carry out and implement the project proposed. (BoS - 20 possible points in 2016)

  - New applicants must sufficiently describe experience administering federally funded grants, and submit the most recent financial audit, IRS Form 990, and list of current board members.

  - Should describe how project will reach full operational capacity. New applications that do not demonstrate capacity to carry out project may be rejected by the review team.

HUD & CoC Priorities

- Seven Overarching Policy Priorities Guiding the 2016 NOFA*
  - Create a Systematic Response to Ending Homelessness
  - Strategic Resource Reallocation
  - Ending Chronic Homelessness
  - Ending Family Homelessness
  - Ending Youth Homelessness
  - Ending Veteran Homelessness
  - Using a Housing First Approach

High Priority CoC Application Questions

- CoC Project Review, Ranking & Selection
  - CoC process & criteria - 10 of 10
  - CoC considers severity of needs for project priorities - 4 of 4
- HMIS Bed Coverage - 2 of 4
- CoC System Performance
  - Point-in-Time Count (reduction) – 7 of 7
  - Length of Time Homeless (CoC efforts) – 7 of 7
  - PSH Exits to or Retention Permanent Destination - 4 of 4
  - Exit to or Retention of PH (2014-15) – 3 of 3
  - Returns to Homelessness – 4 of 2
  - Submission of System Performance data – 10 of 10

High Priority CoC Application Questions (cont'd)

- ❑ CoC Performance & Strategic Planning Objectives
  - ■ PSH Beds Dedicated for use by Chronically Homeless – 3 of 10
  - ■ RRH Units for Families (2015 & 2016) – 0 of 5
  - ■ Total number of Veterans (2014 & 2016) – 6 of 8
- ❑ Additional Policies
  - ■ Percentage of Low Barrier projects – 6 of 6
  - ■ Percentage of Housing First projects – 6 of 6
  - ■ RRH available (2015 & 2016) 4 of 4

2016 GA Balance of State CoC Scoring

- CoC Governance & Structure: 45.75 (of 51)

- Data Collection & Quality: 25 (of 27)

- CoC Performance & Strategic Planning: 70.5 (of 101)

- Cross-Cutting Policies: 17 (of 21)

Total CoC Application Score: 158.25 (of 200)

(Highest 187.75/Lowest 79/ Median 154.5/ Weighted Mean 160.7)

2016 Renewal Performance & CoC Priority Scoring (145 Possible Points)

- Demonstration of capacity to carry out and implement project - Threshold
- Utilization of grant funds – 5 points*
- Quarterly Draw Downs from LOCCS – 5 points
- Project Utilization Units/Clients – 5 points*
- Housing Stability – 20 points
- Length of Stay & Returns to Homelessness (Informational)
- Project has dedicated beds for people who are chronically homeless – 10 points
- Project targets/serves Veterans – 10 points
- Project serves persons with special needs or high barriers to housing – 10 points

2016 Renewal Performance & CoC Priority Scoring (145 Possible Points) (cont'd)

- Project Eligibility (street or shelter previous residence) – 10 points
- Employment Income – 10 points
- Increased Income (all sources) – 10 points
- Non Cash Mainstream Benefits – 10 points
- Exits to streets, shelter, or unknown – 11 points
- HUD monitoring – 4 points
- CoC participation – 10 points
- HMIS data quality – 5 points
- Match – 5 points
- Leveraging – 5 points

2016 Renewal Performance & CoC Priority Scoring (handouts)

- 2016 Awards
- New Scoring Criteria
  - Quarterly drawdowns from LOCCS
  - Length of Stay
  - Returns to Homelessness
  - Project Eligibility
- Renewal Project Scores

Housing First, Low Barrier & Mainstream Resources in the 2016 Competition

Housing First: Low Barrier Entry (CoC Score)

- <u>Low Barrier:</u>
- Does the project quickly move participants into permanent housing?
- Does project ensure participants are NOT screened out based on barriers such as:
  - Having too little or no income
  - Current or past substance abuse
  - Having a criminal record (w/exception of state-mandated restrictions)
  - Having a history of domestic violence
- 92% BoS Applicants committed to being Low Barrier
- Need System-wide (increased 11% in 2016)

Housing First: Service Participation Requirements (CoC Score)

- Housing First:

- Does project ensure participants are NOT terminated for:
  - Failure to participate in supportive services
  - Failure to make progress on a services plan
  - Loss of income or failure to improve income
  - Being a victim of domestic violence

- 89% BoS Applicants Committed to being Housing First

- Need System-wide

- HUD goal is 95% (increased 24% in 2016)

Mainstream Resources (CoC Score)

- Mainstream Resources: Does the project include the following activities (<u>36% BoS responded Yes for all</u>):
  - Transportation Assistance (97% BoS)
  - Single application for four or more mainstream programs (59% BoS)
  - Annual follow-ups to endure benefits received or renewed (100% BoS)
  - Participants have access to SSI/SSDI technical assistance (97% BoS)
  - Provider completed SOAR training in past 24 months (53% BoS)

Homeless Definition

HUD Homeless Definition

Category 1

1. An individual or family:

- With a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground

- Living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals) **or**

- Who is exiting an institution where he or she resided for 90 days or less AND who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

HUD Homeless Definition

Category 2

2. Individuals and families who will imminently lose their primary nighttime residence; **(qualify for ES, TH, Prevention)**

- The residence will be lost within **14** days of the date of application for homeless assistance;

- No subsequent residence has been identified; **and**

- The individual or family lacks the resources or support networks, [e.g., family, friends, faith-based or other social networks] needed to obtain other permanent housing

Category 2 does NOT qualify for CoC program

HUD Homeless Definition

Category 3

□ 3. Unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition; (may qualify for ES, Hotel/Motel Vouchers, TH, Services, Prevention depending on specific statute)

Category 3 does NOT qualify for CoC program

HUD Homeless Definition

Category 4

(4) Individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member. **(may qualify for PSH, ES, TH, Supportive Services, Hotel/Motel Voucher, RRH IF also meet CATEGORY 1, may qualify for Prevention if also at risk)**

CoC Definition of Homelessness

The CoC program specifically targets homeless persons who:

- (1) Individuals and families who lack a fixed, regular, and adequate nighttime residence and includes a subset for an individual who resided in an emergency shelter or a place not meant for human habitation and who is exiting an institution where he or she temporarily resided;

- (4) individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member.

HUD AAQ (TH and CoC-funded RRH Eligibility)

- HUD Response: Under the **CoC program,** to be eligible for RRH assistance an individual or family must be homeless per HUD's definition of homeless, **and** must meet any additional eligibility criteria established in the CoC Program interim rule and the Fiscal Year NOFA under which the project was funded.

- (Ex: individuals and families that are residing in *transitional housing for homeless persons* are considered homeless under paragraph 1 of the definition of homeless in section 578.3 of the <u>CoC Program interim rule</u>; <u>however</u>, in general, families that come from transitional housing would *not* be eligible for RRH funded through recent CoC Program NOFAs because:

HUD AAQ (TH and CoC-funded RRH Eligibility) (cont'd)

❑ RRH projects created through reallocation and funded as new projects under the FY 2013-14 CoC Program Notice of Funding Availability (NOFA), must serve households with children living on the streets or in emergency shelter.

❑ RRH projects funded as new projects through the Permanent Housing Bonus or created through reallocation under the FY 2015 CoC Program NOFA or FY 2016 CoC Program NOFA must serve homeless individuals and families who enter directly from the streets or emergency shelters and persons who meet the criteria of paragraph (4) of the definition of homeless.

❑ Please note that there is no requirement that individuals and families who meet the criteria of paragraph (4) of HUD's definition also be currently living on the streets or in emergency shelters in order to be eligible for RRH assistance funded through a new FY 2015 or FY 2016 CoC Program RRH project.

Eligibility Documentation Category 1

Category 1 – Literally Homeless

- ❑ a) Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); **OR**

- ❑ b) Written observation by an outreach worker; **OR**

- ❑ c) Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;

- ❑ d) For individuals exiting an institution – one of the forms of evidence above <u>and</u>;

  - ■ i) Discharge paperwork <u>or</u> written/oral referral, <u>or</u>

  - ■ ii) Written record of intake worker's due diligence to obtain above evidence <u>and</u> certification by individual that they exited the institution

If the provider is using anything other than Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

Eligibility Documentation Category 4

Category 4 – Fleeing/Attempting to Flee DV

❑ **For victim service providers:**

    ❑ i. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

❑ **For non-victim service providers:**

    ❑ i. Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; **AND**

    ❑ ii. Certification by the individual or head of household that no subsequent residence has been identified; **AND**

    ❑ iii. Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Chronic Homelessness

Georgia® Department of
Community Affairs

Chronically Homeless

- Definition of "chronically homeless" provides a way to prioritize people with longest histories of homelessness and most severe needs

- Seeks to ensure that persons with highest needs are prioritized for permanent supportive housing

Final Definition of Chronically Homeless
(Amends 24 CFR 91.5 and 24 CFR 578.3)

Chronically Homeless means:

(1) A "homeless individual with a disability," as defined in the Act, who:

- ❑ Lives in a place not meant for human habitation, a safe haven, or emergency shelter; and
- ❑ Has been homeless (as described above) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months
  - Occasions separated by a break of at least 7 nights
  - Stays in an institution of fewer than 90 days do not constitute a break

Final Definition of Chronically Homeless
(Amends 24 CFR 91.5 and 24 CFR 578.3)

Chronically Homeless means: (contd.):

(2) An individual who has been residing in an institutional care facility for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering the facility; or

(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Summary of Major Changes

❑ Four occasions must total 12 months

❑ Replaced "disabling condition" with "homeless individual with a disability"

❑ "Occasion" is defined by a break of at least 7 nights not residing in an emergency shelter, safe haven, or residing in a place not meant for human habitation (e.g, staying with a friend, in a hotel/motel paid for by a program participant)

❑ Stays in institution of fewer than 90 days does not constitute as a break and count toward total time homeless

❑ New Recordkeeping Requirements under CoC Program

❑ Effective – CoC Program Recipients must comply for participants admitted after January 15, 2016

Recordkeeping Requirements Documenting Chronic Homelessness (handout)

- Documenting time spent living in a place not meant for human habitation, an emergency shelter, or a safe haven

- Documenting time spent in institutions

- Documenting breaks in homelessness

- Documenting the existence of a disability

Key Things to Remember

All programs should document where the individual was living at all times, including occasions of homelessness and breaks.

Breaks in homelessness may be documented entirely based on a self-report by the individual seeking assistance.

- Include as much detail as possible and keep case files user-friendly.
  - **Note**: Watch out for details that undercut your evidence! Document your efforts to resolve conflicting details that could undercut the evidence you're relying on.

- Remember HUD's stipulated order of priority! Rely on self-certification as a last resort, and back it up!

Key Things to Remember

- You are not required to verify every *day* of homelessness in a given month but instead, that a single encounter with a homeless service provider in a given month would be sufficient third-party evidence that the individual or family has been homeless for the entire month…

…unless there is evidence that the individual or family had a break of at least 7 consecutive nights in their homeless occasion during that month

(e.g., HMIS program enrollment of transitional housing or was housed with a friend or family member).
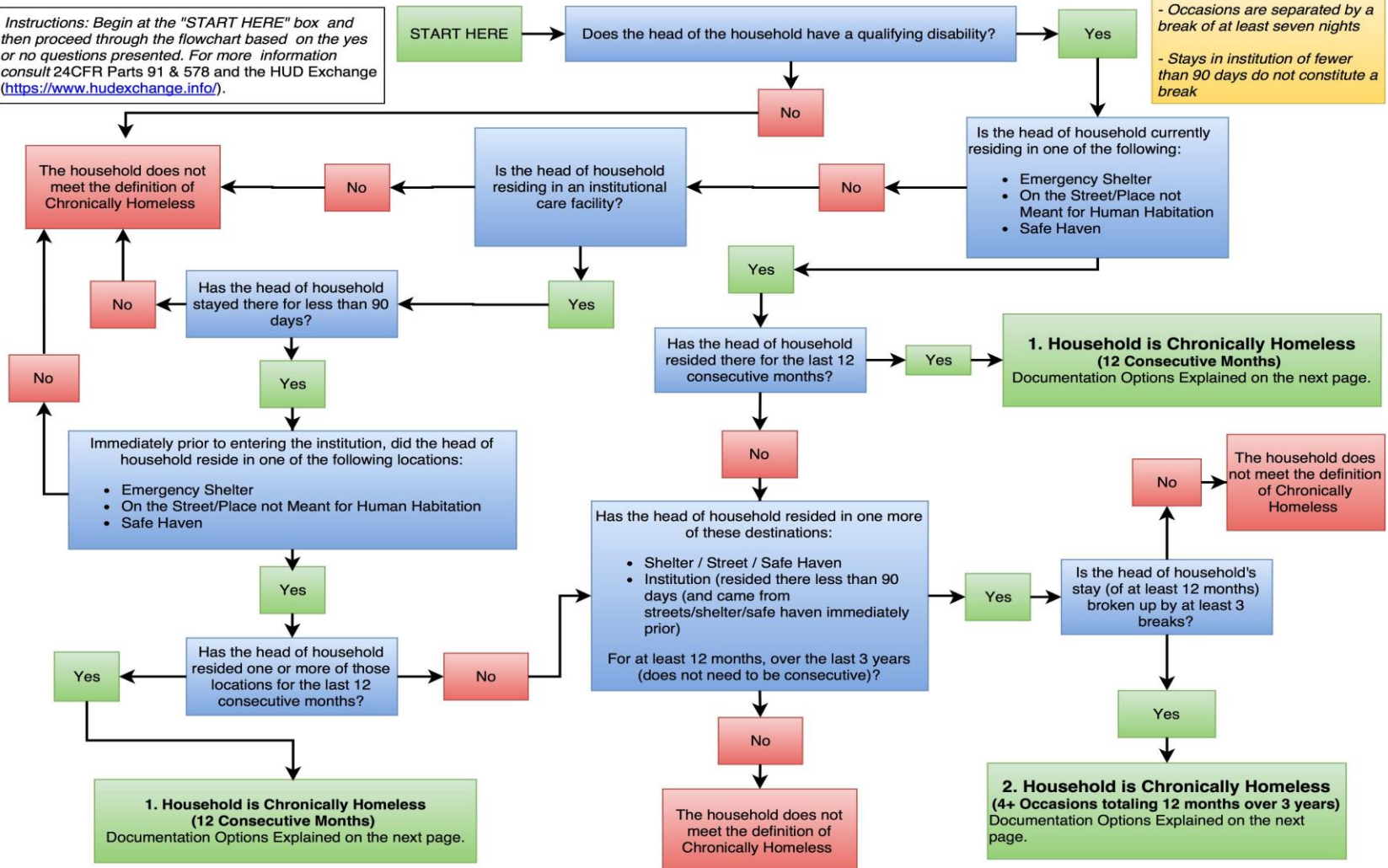
Key Things to Remember

Example: HMIS/Outreach is able to document a person was homeless on May 5th. This documentation can be applied to the entire month of May (May 1st to May 31st) unless there is evidence that there has been at least 7 consecutive nights not living in a place not meant for habitation or emergency shelter during the month.

HUD's Chronic Flowchart

Instructions: Begin at the "START HERE" box and then proceed through the flowchart based on the yes or no questions presented. For more information consult 24CFR Parts 91 & 578 and the HUD Exchange (https://www.hudexchange.info/).

START HERE

Does the head of the household have a qualifying disability?

Yes

No

Remember:
- Occasions are separated by a break of at least seven nights
- Stays in institution of fewer than 90 days do not constitute a break

Is the head of household currently residing in one of the following:
- Emergency Shelter
- On the Street/Place not Meant for Human Habitation
- Safe Haven

No

Is the head of household residing in an institutional care facility?

No

The household does not meet the definition of Chronically Homeless

No

Has the head of household stayed there for less than 90 days?

Yes

Yes

Yes

Has the head of household resided there for the last 12 consecutive months?

Yes

1. Household is Chronically Homeless (12 Consecutive Months) Documentation Options Explained on the next page.

No

No

Immediately prior to entering the institution, did the head of household reside in one of the following locations:
- Emergency Shelter
- On the Street/Place not Meant for Human Habitation
- Safe Haven

Yes

Has the head of household resided in one more of these destinations:
- Shelter / Street / Safe Haven
- Institution (resided there less than 90 days (and came from streets/shelter/safe haven immediately prior)

For at least 12 months, over the last 3 years (does not need to be consecutive)?

Yes

Is the head of household's stay (of at least 12 months) broken up by at least 3 breaks?

No

The household does not meet the definition of Chronically Homeless

Yes

Has the head of household resided one or more of those locations for the last 12 consecutive months?

No

No

No

The household does not meet the definition of Chronically Homeless

1. Household is Chronically Homeless (12 Consecutive Months) Documentation Options Explained on the next page.

2. Household is Chronically Homeless (4+ Occasions totaling 12 months over 3 years) Documentation Options Explained on the next page.

Chronic Homelessness: PSH Prioritization of Beds at Turnover

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Chronic Homelessness Prioritization
(Updates to align with CPD-16-11 pending)

- CoC written standards and policy prioritizing PSH beds for people who are chronically homeless approved 11/4/15.

- This policy establishes written standards for PSH projects and formerly adopts HUD's Notice CPD-14-012, *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing*, originally issued on July 28, 2014 (updated 8/24/16), in that those experiencing chronic homelessness should be given priority for non-dedicated PSH beds as vacancies become available through turnover.

- CoC Policy 85% minimum (prioritization of non-dedicated beds)

- 100% of 2016 PSH Applicants Committed

Chronic Homelessness Prioritization (contd.)

- Establishes order of priority:

- Dedicated PSH beds for chronically homeless
  - 1st Longest history of homelessness w/most severe needs
  - 2nd Longest history of homelessness
  - 3rd Most severe service needs
  - 4th All other chronically homeless

- Non-Dedicated PSH beds
  - 1st Disability w/most severe service needs
  - 2nd Disability w/long period of continuous or episodic homelessness
  - 3rd Disability coming from places not meant for human habitation, safe havens, or emergency shelter
  - 4th Disability coming from transitional housing (entering from literal homelessness)

CPD-16-11 Prioritization Recordkeeping Requirements (handout)

- 24 CFR 578.103(a)(4) of the <u>CoC Program Interim Rule (Formatted Version)</u> outlines documentation requirements for **all recipients of dedicated and non-dedicated** CoC Program-funded PSH associated with determining **whether or not** an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, the BoS CoC expects that CoC recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

CPD-16-11 Prioritization Recordkeeping Requirements (handout) (cont'd)

- **A. Evidence of Severe Service Needs.** Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in Appendix VII of the Written Standards using data-driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case-conferencing decisions.

CPD-16-11 Prioritization Recordkeeping Requirements (handout) (cont'd)

- **B. Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance.** Recipients must follow the CoC's written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC's adoption of written standards for prioritizing assistance, recipients must in turn document that the CoC's revised written standards have been incorporated into the recipient's intake procedures and that the recipient is following its intake procedures when accepting new project participants into the project.

Prioritization Recordkeeping Requirements (cont'd)

❑ **C. Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.**

- **(a)** When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area – or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area – at the point in which a vacancy became available.

Prioritization Recordkeeping Requirements (cont'd)

- This documentation should include evidence of the outreach efforts to locate eligible chronically homeless households within the defined geographic area
- And, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this condition and the attempts that have been made to engage the individual or family.

Prioritization Recordkeeping Requirements (cont'd)

- **(b)** When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC's geographic area - or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area - that met a higher priority.

System Performance and Reporting Updates

System Level Performance Measures
2016 Baseline Year

❑ Measurement of System Performance for Each Continuum

1. Length of Time People Remain Homeless

2. Extent People who Exit Homelessness Return to Homelessness

3. Number of Homeless People (Reduction)

4. Employment and Income Growth for Homeless People in CoC Program-funded Projects

5. Number of People who Become Homeless for the First Time

6. Successful Placement from Street Outreach and Successful Placement in Retention of Permanent Housing

System Level Performance Measures 2017

- For the second year, CoCs will be asked to submit their SPM reports to HUD via HDX

- Data to be pulled of all projects covering 10/1/2015 - 9/30/2016

- HDX System open for CoC submission April 3rd to May 31st

- CoC's working with HMIS Lead and CoC Program recipients to prepare for annual and new reporting requirements

- CoC Program recipients should monitor project data quality and prepare for new APR requirements

HUD APR Updates April 2017

- CoC Program grant recipients will submit their APR data through a new online database – the Sage HMIS Reporting Repository (Sage).

- *Communities will no longer submit APRs in e-snaps. This change in systems will apply to all CoC homeless assistance grants.*

HUD APR Updates April 2017

- APR updates include:
  - Allow CSV imports of aggregate data about persons served
  - Integrate project-level performance data into the body of the report
  - Update the data quality components to be consistent with the new HUD-approved *Data Quality framework*; and
  - Provide programming specifications for population-specific questions, among other updates.

HUD APR Updates April 2017

- HMIS Leads working with vendors to access necessary reports and materials in preparation for these APR resources on April 1, 2017. (**In effect April 1, 2017**).

- HMIS Leads and CoC Program grant recipients should be working together now to prepare for changes to the APR format and submission process. More details, including training and resources, about the new report and system will be released shortly.

Resources

- DCA's Continuum webpage - https://www.dca.ga.gov/housing/HousingDevelopment/programs/continuumofcare.asp

- HUD's Continuum of Care Interim Rule https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/

- HUD's Continuum of Care webpage – https://www.hudexchange.info/coc/

Thank you so much for your participation!

- Questions?

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